

EXHIBIT I

1 A. No.

2 Q. By forbearance, I mean, he reached an
3 agreement with the loan servicer to temporarily stop
4 making payments. Were you aware of that?

5 A. No.

6 Q. All right. So then, presumably, he didn't
7 have any discussions with you about that at that
8 time; is that right?

9 A. No.

10 Q. Did Mr. Calcut have any discussions with you
11 about entering a loan modification in 2021?

12 A. I don't recall. I don't think so.

13 Q. I'm going to ask you to look at Exhibit 8.

14 MS. SNYDER: Ben?

15 MR. MILAM: Yes.

16 MS. SNYDER: I think you are going to need
17 to tell us what the exhibits are, because we had to
18 print them so we don't have identified --

19 MR. MILAM: They are all just in a stack
20 again, Brent, so I just have to go through them one
21 by one, so just give me a second. Okay?

22 MR. MILAM: Okay.

23 BY MR. MILAM:

24 Q. And, just for the record, I'm asking
25 Mrs. Calcut to review a June 1, 2021, letter with

1 PRMG's logo at the very top.

2 A. I don't recall seeing this.

3 Q. All right. Do you remember talking with
4 Mr. Calcut about making any trial modification
5 payments in 2021?

6 A. No.

7 Q. All right. During 2021, were you aware that
8 Mr. Calcut was noticing any negative reporting on
9 his credit?

10 A. No. I don't think so.

11 Q. Have you ever tried to get a credit report
12 for your own credit?

13 A. No.

14 Q. Do you know if there has ever been any
15 negative reporting on your credit?

16 A. No.

17 Q. "No" you don't know, or "no" you don't think
18 there has been?

19 A. Well, I only have one credit card, and it's
20 always good -- from Kohl's.

21 Q. Okay. So you don't know whether there has
22 been -- you don't know what information has been
23 reported on your credit; is that accurate?

24 A. Accurate.

25 Q. Do you remember receiving any mail from PRMG

1 or anybody else about corrections to your credit?

2 A. Could you repeat that, please.

3 Q. Did you receive any mail from PRMG that's
4 Paramount Residential Mortgage Group or anybody else
5 about corrections to your credit?

6 A. No.

7 Q. All right. Have you at any time reviewed
8 credit reports either for you or for Mr. Calcut?

9 A. No.

10 Q. All right. You said you have just one
11 credit card that's in your name; is that correct?

12 A. Yes.

13 Q. All right. What bank or company is that
14 credit card with?

15 A. Well, it's Kohl's. I don't know.

16 Q. Kohl's, the department store?

17 A. Yes. Kohl's, the department store.

18 Q. Are you familiar with any -- are you
19 familiar with any effort by you or your husband to
20 increase a credit limit with Citibank?

21 A. No. I'm not familiar.

22 Q. What about an effort to increase credit
23 limit with Synchrony Bank?

24 A. With what bank?

25 Q. Synchrony Bank.

1 STATE OF ARIZONA)
) ss
2 COUNTY OF MARICOPA)

3 BE IT KNOWN that the foregoing deposition
4 was taken by me, VICKI L. O'CEALLAIGH CHAMPION, CR
5 No. 50534, a Certified Reporter for the State of
6 Arizona; that prior to being examined, the witness
7 named was duly sworn to testify to the whole truth;
8 that the questions propounded and the answers of the
9 witness thereto were taken down by me and thereafter
10 reduced to computerized transcription under my
11 direction and supervision; that the foregoing is a
12 true and correct transcript of all proceedings had
13 upon the taking of said deposition, all done to the
14 best of my skill and ability.

15 I further certify that I am in no way
16 related to any party to said action nor in any way
17 interested in the outcome thereof.

18 I CERTIFY that I have complied with the
19 ethical obligations set forth in ACJA 7-206(F)(3)
20 and ACJA 7-206 J(1)(g)(1) and (2).

21 DATED at Phoenix, Arizona, this ** day of
22 April, 2023.

23 
24

VICKI L. O'CEALLAIGH CHAMPION

25 CR No. 50534